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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No.: 4:22-cv-01490-JST

**REPLY ISO NETFLIX'S MOTION
FOR AN ORDER TO SHOW CAUSE**

Judge: Hon. Jon S. Tigar

REPLY ISO NETFLIX'S MOTION FOR AN ORDER TO SHOW CAUSE

On November 6, 2023, Netflix filed a Motion For An Order To Show Cause Why Valjakka And His Agents Should Not Be Held In Civil Contempt For Their Failure To Comply With This Court's Preliminary Injunction. Dkt. No. 216. In its Motion, Netflix expressed concern that:

- (1) Valjakka testified in deposition that he had not read the Court's preliminary injunction ("PI") Order (*see* Mot. at 4:1-8, 8:19-22);
- (2) Valjakka's deposition testimony demonstrated that he did not have an accurate understanding of the Court's PI Order (*see* Mot. at 4:9-5:13, 8:23-9:3);
- (3) Valjakka testified in deposition that he had asked his attorneys to clarify the Court's PI Order, but they had failed to do so (*see* Mot. at 9:3-4); and
- (4) Neither the Ramey Firm nor AiPi demonstrated compliance with the Court's PI Order, nor appeared to acknowledge they were subject to the Court's PI Order. *See* Mot. at 3:11-24, 5:19-6:8, 9:10-10:12.

Valjakka's November 9, 2023 Response (Dkt. No. 224) does not resolve or moot the issues above at least because:

- (1) Valjakka's Response does not state that Valjakka read the Court's PI Order;
- (2) Valjakka's Response does not state that Valjakka believes his counsel adequately explained the Court's PI Order to him; and
- (3) Valjakka's response does not respond to any of the allegations against AiPi, even though Valjakka and AiPi share counsel. Valjakka states that "[a]ll Enforcement Assets were transferred to AiPi." (Dkt. No. 224 at 2) and Ramey stated that AiPi "controls" the Enforcement Assets (Dkt. No. 224-1, 3:11-13). AiPi's adherence to the Court's PI Order is highly material.

Among other unanswered concerns. Netflix respectfully submits that contrary to his assertions (*see* Resp. at 1:25-27), Valjakka has not demonstrated that Netflix's Motion has been mooted.

By: /s/ Rachael D. Lamkin

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